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National Association as Trustee for Wells Fargo  
Asset Securities Corporation, Mortgage Pass-  
Through Certificates Series 2006-AR10

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

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In re:

Chapter 13  
Case No. 18-44081-nhl

Mohammed M. Haque,

Debtor.

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**NOTICE OF MOTION OF WELLS FARGO'S MOTION  
FOR RECONSIDERATION AND/OR RELIEF FROM THE  
JUNE 17, 2019 ORDER AND FOR A STAY OF THAT ORDER  
PENDING A DECISION ON THIS MOTION**

**PLEASE TAKE NOTICE** that HSBC Bank USA, National Association as Trustee for Wells Fargo Asset Securities Corporation, Mortgage Pass-Through Certificates Series 2006-AR10 ("Wells Fargo"), by and though its Counsel Reed Smith LLP, will move before the Honorable Nancy H. Lord, United States Bankruptcy Judge, Courtroom 3577, United States Bankruptcy Court for the Eastern District of New York, Conrad B. Duberstein Courthouse, 271-C Cadman Plaza East, Brooklyn, NY 11201-1800 on July 16, 2019 at 2:30 p.m., or as soon thereafter as the matter may be heard, for reconsideration of the Order for Document Production, entered on June 17, 2019 (the "June 17 Order") [Doc. No. 65], or, alternatively, modification of the June 17 Order significantly to: (i) limit the scope; (ii) eliminate the requirement to provide sworn testimony from senior executives; and (iii) extend the July 1, 2019 document production date to forty-five days from the date the Court rules on this motion, and in the interim stay the June 17 Order, pending a decision on this motion.

**PLEASE TAKE FURTHER NOTICE** that in support of the instant motion, Wells Fargo shall rely upon the Memorandum of Law in Support of Motion.

**PLEASE TAKE FURTHER NOTICE**, that objections to the relief requested in the instant motion, if any, must be in writing, conform with the Bankruptcy Code and Rules, state with particularity the grounds therefor and be filed with the Court, with a courtesy copy to the Chambers of the Honorable Nancy Hershey Lord, United States Bankruptcy Judge for the Eastern District of New York, and served upon, so as to be received by, Reed Smith LLP, 599 Lexington Avenue, New York, NY 10022, Attn: John L. Scott, Esq., the attorneys for Wells Fargo, no later than **July 9, 2019, at 4:00 P.M.** as follows: (a) (i) through the Bankruptcy Court's electronic filing system, which may be accessed through the internet at the Bankruptcy Court's website at [www.nyeb.uscourts.gov](http://www.nyeb.uscourts.gov); and (ii) in portable document format (PDF) using Adobe Exchange Software for conversion; or (b) if a party is unavailable to file electronically, such party shall submit the objection in PDF format on a diskette in an envelope with the case name, case number, type and title of document, document number to which the objection refers and the file name on the outside of the envelope.

**PLEASE TAKE FURTHER NOTICE**, that the hearing to consider the instant motion may be adjourned without further notice other than by announcement of such adjournment in open Court.

**PLEASE TAKE FURTHER NOTICE**, that if no objections with respect to the instant motion are timely filed and served, the Court may decide that you do not oppose the motion and an Order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York  
June 27, 2019

REED SMITH LLP

By: John L. Scott

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